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USDOC FOR 532/OEA/LHINES/ADYSON/SSILVER
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: ASIA LINK (HONG KONG) LTD.

REF: A) USDOC 10521

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) attempted to conduct a post shipment verification (PSV) at Asia Link (Hong Kong) Ltd., Room 1022, 10/Floor, No. 1 Hung To Road, Kwun Tong, Kowloon, Hong Kong (Asia Link). The items in question are navigation parts for civil aircraft, a course deviations indicator and antennas and parts for radar, radio navigational aids exported to Asia Link on or about September 11, 2006, June 8, 2007 and January 15, 2007. Certain of the items are classified under Export Control Classification Number (ECCN) 7A994 and are controlled for anti-terrorism reasons (AT). The exporter was Garmin International of Olathe, Kansas.

¶3. A Hong Kong Companies Registry search reveals that Asia Link has been in existence since 2001. It has less than 1 USD in paid-up share capital. Its director is Li, Yanan with Hong Kong identification number P983393(9). Li, Yanan is not a director in any other company in Hong Kong. An Internet search reveals that Asia Link is a distributor of Garmin (the exporter) in Hong Kong and acts as a supplier of GPS devices in Asia. An Internet company profile of the company lists a second address, namely, Room 504, Nam Wo Hong Building, 148 Wing Lok Street, Sheung Wan, Hong Kong.

¶4. This second address is also listed as the corporate address for a second Hong Kong company, namely HK Carcom Electronic Technologies Limited (Carcom). According to the Hong Kong Companies Registry, this company likewise has less than USD 1 in paid-up share capital. Its director is listed as CP Corporate Services Limited. According to information on this company's web site (www.e-carcar.com), Carcom focuses on car audio/video, PMP/GPS, and Smart Phone design, development, manufacturing and marketing. Its web site includes a range of GPS devices for automotive applications. This company also has a Shenzhen office.

¶5. Commercial Assistant Carrie Chan and ECO attempted, on several occasions, to schedule the PSV with Asia Link. Over the course of several weeks, Asia Link representatives steadfastly refused to meet with the ECO. Eventually, Asia Link representatives provided documentation purporting to confirm receipt of the January 2007 and June 2007 shipments. Asia Link declined to provide information about the September 2006 shipment citing business reasons. Asia Link also refused to provide any details about the end user or end use of the items in question. The Asia Link representative stated that the shipments were destined for mainland China but declined to provide additional information. Commercial invoices provided by Asia Link (and also OEA) list Beijing Unistrong Science and

Technology as the buyer of the items. This company is a reseller of a range of GPS devices with offices throughout mainland China.

¶6. ECO recommends that OEA conduct a review of shipments destined to Asia Link and Carcom as well as all shipments to the addresses of those companies. ECO also recommends that Asia Link be added to the BIS Unverified List (a public compilation of companies where BIS has been unable to satisfactorily complete a PSV or pre-license check (PLC) for reasons outside of the control of the U.S. government).